

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

YIN SHENG,

Plaintiff,

v.

JOHN DOE, AND 509.COM,

Defendants.

Case No. 1:21-cv-00816-TSE-JFA

**DECLARATION OF TIMOTHY T.
WANG**

IN RE: 509. COM.

I, Timothy T. Wang, declare as follows:

1. I am an attorney with the law firm of Ni, Wang & Massand, PLLC, representing Plaintiff Yin Sheng in the above captioned case.
2. I am under no legal disability and am competent to testify to the facts set forth below. If I were called upon to testify, I could and would testify competently.
3. I have attempted to provide notice and Plaintiff's intent to proceed with this action to Defendant John Doe ("JD"). However, Defendant JD has taken steps to hide its identity and has provided no current address or other contact information to which notice may be sent.
4. On September 2, 2021, I sent notice of the filing of this complaint and application for injunctive relief to mymail39047@gmail.com, which is the registrant email address Defendant JD listed at GoDaddy.com after illegally hacking into Plaintiff's Godaddy.com registrant account and obtaining unauthorized access to the subject Domain Name. It is last known email owned by Defendant JD. On September 2, 2021, I sent notice of the filing of this complaint and application for injunctive relief to the current WHOIS address on the subject Domain Name which is Domains By Proxy, LLC, 509.com@domainsbyproxy.com, 2155 E Warner Rd, Tempe, AZ 85284.

I declare under penalty of perjury under the laws of the United States of America that
the foregoing is true and correct to the best of my knowledge and belief.

Executed on September 2, 2021 in Dallas, Texas.



Timothy T. Wang